

Department of Water Resources  
Statewide Water Planning Branch  
901 P Street  
Sacramento, CA 95814

Re: California Water Plan Update 2005.

Dear DWR Staff:

I became aware of the public review period for the aforementioned document on July 10, 2005 while surfing the U.S.G.S. Website for earthquake information. The section was unavailable and I logged onto water information. Due to the voluminous material and the short time left for me to address the Draft Plan, I am submitting my comments on the following Chapters and Volumes of the document as they relate to the City of Simi Valley, and the County of Ventura:

VOLUME 2: Resource Management Strategies

- #04 - "...Groundwater Storage"
- #10 - "Floodplain Management"
- #11 - "Groundwater Remediation..."
- #20 - "Urban Land Use Management"
- #23 - "Water Transfers"
- #25 - "Watershed Management"

Volume 4: Reference Guide

Background - What's So Special About Special Districts? A Citizen's Guide to Special Districts in California (Third Edition)

Planning - "Addressing California's Uncertain Water Future by Coordinating Long-Term Land Use And Water Planning: Is a Water Element in The General Plan the Next Step?"

Planning - "...Drought Conditions".

Please note that since many of the aforementioned topics cross paths, at the beginning I am going to story tell and then comment on some of the listed items separately.

For over 13 years, I have been privy to dam inundation issues through addressing various housing development projects in my City. While at the beginning I didn't understand the NFIP system, 10 to 500-year floods, runoff mitigation measures, FEMA soil compaction rates, LOMRs, CLOMRs, etceteras, I opposed many a proposal because my common sense dictated that there were issues of public safety and health that were being short changed. Once I learned some of the ropes, I contacted the Governor's Office of Emergency Services(OES) with regards to the Las Lajas and Runkle Dams Inundation Maps and Studies. I also addressed the FEMA/City of Simi Valley 1997 Flood Insurance Study(FIS) and FIRMs. Also, I addressed the NFIP Call for Issues in 1998. Then, too, I followed up on my City's 1999 Safety Element Update; read the 1990 Master Plan of Drainage, the 1986 Dam Failure Response Plan, and various other related documents; addressed the City Emergency Plan Update, the Hazard Mitigation Plan, and other related documents; and have also addressed the County of Ventura Multi-Jurisdictional Hazard Mitigation Plan, and the Ventura County Watershed Protection District's Flood Mitigation Plan, and Calleguas Creek Watershed area issues. I have also asked for investigations by the FEMA Inspector General, and the Department of Homeland Security's Inspector General for funding irregularities with City and County regional stormwater detention basins' Hazard Mitigation Grant Program applications. And presently, I have been opposing A.B. 1003(Nava). Finally, when I addressed the 2004 State's Multi-Hazard Mitigation Plan (DMA 2K requirement), I opposed it most vehemently because the Dam Inundation Mapping Program was cut and the work is being done on as needed basis. I have also opposed the State's Awareness Floodplain Mapping program because it too falls short and feel it is meant to replace the Dam Inundation Mapping Program.

I am no closer to knowing everything there is to know about floodplain management, but have enough experience under my belt now to know that my City and County are not abiding by floodplain management rules, regulations, and laws that I am aware of; though they can be changed at the whim of a politician, company, and even the military. For the past couple of years, because the decision to include only the western most boundary of the City of Simi Valley in the current FEMA/County of Ventura/Nolte Flood Insurance Study/Evaluation was made by a small group of people--representatives from the Cities of Thousand Oaks, Moorpark, and Simi Valley, FEMA, and U.S. Army Corps of Engineers, etceteras, I have tried in vain to get the rest of my City included because the 1997 FIS was rushed, and done in piecemeal fashion. The County of Ventura unincorporated areas adjacent to the City of Simi Valley were not part of the 1997 study and they are not included in the current study. I will have to wait for my chance to bring this issues up when the study is approved by FEMA, but only on appeal. If this appeal is based on technical, nor practical, discussions then my efforts will still be fruitless and problems will come up when the next heavy downpour occurs--as it did in the early part of 1992 when the Las Lajas Dam sent a 3½ to 4½ feet wall of gushing water through the Simi Hills Gold Course into the Las Lajas Creek that eroded the western bank to the point of endangering a couple of homes yet no evacuation order was given--and property owners impacted will be left holding the bag in the rebuilding process, while at the same time governments like the City of Simi Valley and the County of Ventura get to reap moneys that they are not entitled to because projects that were delayed or deferred until such an opportunity arises get the chunk of change.

The City of Simi Valley City Council conditioned developers projects to mitigate flooding/run-off issues with detention basins. These conditions have been circumvented by applying for FEMA HMGP and State of California Native American/General Fund CDBG Program moneys.

#### PLANNING, DROUGHT CONDITIONS AND FIREFIGHTING

At a time when 49 out of the 50 states were experiencing drought conditions, the City of Simi Valley City Council was approving commercial and municipal development projects with water fountains. It also approved landscaping street

medians to make the City more aesthetically pleasing. In 2003 my family faced the prospect of having to evacuate our home on our own during the Simi Fire Siege. In January 2004 I attended the Governor Davis/Elected Governor Schwarzenegger appointed Blue Ribbon Fire Commission meeting in Westlake Village. I have read most of the other hearings by the Commission on the OES' Website, and have read almost all of the reports on the Southern California Fire Storm of 2003, as well as kept up with the San Diego Tribune newspaper's extensive coverage. The Federal Government has grounded fire fighting air tankers. The West is once again experiencing drought conditions. The Canadian water dropping airplanes should not only be rented but purchased. This would be good for NAFTA, and would help considerably in saving more lives, property, and fire fighting air machinery pilots, and ground fire fighting personnel, in light of the fact that inmates are used to help in run-away fire situations.

#### GROUNDWATER AND WATER RIGHTS

After over a decade of Rockwell (now Boeing) Rocketdyne Santa Susana Field Laboratory soil, air, and water contamination DTSC, U.S. EPA, and DOE meetings, my City agreed to join with Calleguas Municipal Water District on a well water project on the West End of town to supplement the potable water supply. There have been no public hearings on the matter. At a City Council meeting, the City Manager spoke about the water rights to the groundwater. I've asked about this, but have received no reply. As a matter of fact, I address the City's budget --have for about 7 years each fiscal year--but the City has decided to limit responses, or presently my correspondence is no longer responded to under the premise that the City is not legally required to do so. According to the DWR's April 13, 2005 "News for Immediate Release" notice on the "California Water Plan Release for Public Review" it is stated "'Public participation is especially important when we are planning for the state's future water needs,' said DWR Director Lester A. Snow."

This situation I was also confronted with when I addressed the 2000 Urban Water Management Plan for the Metropolitan Water District. MWD staff called me when I wrote to the Board with my concerns and comments on their Plan. They were going to respond to my correspondence, but

to date I have not heard from MWD staff even though for a few months I left telephone messages about the matter. I don't understand what is the problem because I also addressed the Waterworks District #8, and Calleguas MWD Plans, and I received responses from these entities.

This same non-response problem exists with the County of Ventura. No matter what issue related to the Arroyo Simi, or any of its tributaries, I address I receive no responses from County staff. One of the Supervisors outside of our district has been kind enough to respond on her own on some of my correspondence, or had her staff provide faxed copies of County Board meetings' agendas or staff reports because I was unable to get them due to computer problems (the information is available through the County Website), or the fact that my forms of transportation have been tampered with so much through the years that I don't venture to their meetings, or to the Hall of Administration. As a matter of fact, the Board of Supervisors has undertaken and approved the County Multi-Jurisdictional Hazard Mitigation Plan, and next Tuesday the same members as Directors of the Ventura County Watershed Protection District will be undertaking the same document, yet since I addressed the Draft Plan back in 2004 I have not received any responses to my correspondence submitted during the public review period. Neither have I received any response to my public review period correspondence on the Ventura County Watershed Protection District's Flood Mitigation Plan. Both of these documents have major erroneous, inaccurate, or incomplete problems. The Board of Supervisors/Directors have still not undertaken the Flood Mitigation Plan.

#### URBAN LAND USE MANAGEMENT

Since the City of Simi Valley City Council has year after year deferred undertaking the update of the 1988 General Plan, I formally asked CA Attorney General Lockyer to investigate the matter. I also asked the Governor's Office of Planning and Research for help. I quoted the State Government Code Sections that stated the OPR is supposed to get involved when a local government has not updated its General Plan after 8 years, and that the OPR is supposed to contact the AG in order to get things going. The AG didn't want to get involved, neither did the OPR. While the Simi Valley City Council just in June 2005

allocated funds to begin the process the City is still dragging its feet. The impact to planning around the City has led to what used to happen before the early 1990's-- piecemeal development. Commercial zoned areas have been rezoned residential and vice versa. Then, too, there are traffic problems because the Circulation Element is not updated, and there are other types of impacts because the Community Element is also not updated.

#### WATERSHED MANAGEMENT

When the Calleguas Creek Watershed area study was first undertaken in the 1990's I was against having a cumulative source impact program instead of individual point sources scrutinized. This has led to blaming anyone and everyone for the pollution to the watershed instead of with the real perpetrator.

The Ventura County Flood Control District was renamed the Ventura County Watershed Protection District in order to garner more grant moneys. It was also to delete the cleanup of sediment deposited into the Arroyo Simi and its tributaries to save costs in order to use the funds to build watershed related projects. This allows for narrowed waterways, and raised waterway floors.

Since I receive no responses to my inquiries, it is very possible that moneys from development projects earmarked for flood mitigation measures have been used instead for watershed related projects.

#### VOLUME 4: REFERENCE GUIDE(SPECIAL DISTRICTS)

In the 1990's, I wrote to the Hoover Commission on this very subject because I was dealing with the Simi Valley Public Cemetery and the Cemetery District Board over problems with records, bodies buried in graves not belonging to the individual buried there, meetings taking place at a local, no financial reports, etceteras. There were constant meeting cancellations, then when meetings did take place they were set up only for Board members to sign the warrants. Certain things were being planned without studies. Then the biggest problems were: 1. my County Supervisor's staff asked that I destroy information that I

had received from the Cemetery's caretaker/District Board Secretary, and 2. a former District Board chairman denying public access to District records(would be available if attended Board meetings, but even then access was denied, he said files were in his business office's desk, and after he resigned we were told he had no records). I also addressed the Ventura LAFCO's service review process with a report of my own. I have followed up on the Ventura County Flood Control District(now Watershed Protection District) on the issue of National Pollution Discharge Elimination System Program fees because the Director of the Ventura County Public Works Agency was the City of Simi Valley Public Works Department's Director. During his tenure he lied about the City of Moorpark City Council already undertaking the NPDES issue when it had not. He also stated that the Ventura County Flood Control District did not have a financing mechanism in place for the detention basins project when in March 1992 the City requested that the Ventura County Board of Supervisors include fees for their purpose under the District's Benefit Assessment Program. And now the Watershed Protection District under his wing, has gone behind the backs of the Supervisors and has misinformed the Board about the proposed property-related fees they contemplate for NPDES Program related projects--which along with the existing assessment fees would lead to six fold charges. It is very difficult to keep track of what a special district is doing when the public is cut off from the process, when Boards are mislead, and to follow the money because of accounting irregularities, or worse.

#### CHAPTER 10 RECOMMENDATIONS

- #1 - Number 22(Watershed Monitoring - The State and others should financially support the monitoring of flood management projects on a watershed level). Why does the State have to support such activity reserved for watershed protection or flood control districts? If A.B. 1003(Nava) is signed into law by Governor Schwarzenegger, or allowed to become law on its own, the Ventura Watershed Protection District will really be swimming in dough!!! Who are the "others"? They must be named! (Page 10-4)

RECOMMENDATIONS FOR FLOODPLAIN MANAGEMENT

- #1 - Number 1 (The State should expand its Awareness Floodplain Mapping Program for use by local governments and the public. No!!! This circumvents CA dam inundation mapping laws. The Dam Inundation Mapping Program funding and staff must be restored, instead of having OES staff perform the work as needed. The dam inspection process must not leave the door open to loopholes because the facility is private, State or Federal Government owned.
- #2 - Number 2 (Wherever practical, floodplain maps should be prepared on a watershed basis). No!!! How does this affect FEMA FIRMs and FISs?

DWR Water Plan staff, the Draft does not "accurately" reflect the role of the regional and local agencies water management role in "promoting water use efficiency and preserving our natural surroundings" in Ventura County, and specifically the City of Simi Valley. I am opposed to the integrated regional water management system because it does not help my City and County meet their objectives". If anything it gives local governments a way out of doing what they were, and are supposed to do, as well as helps them get away with violations.

Sincerely,



Mrs. Teresa Jordan